

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS,

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS-HARVARD FACULTY  
CHAPTER,

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS AT NEW YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS-AMERICAN  
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE,

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, and the  
DEPARTMENT OF HOMELAND SECURITY,

TODD LYONS, in his official capacity as Acting  
Director of U.S. Immigration and Customs  
Enforcement,

DONALD J. TRUMP, in his official capacity as  
President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

**UNOPPOSED MOTION FOR LEAVE TO FILE AMICUS BRIEF OF PRESIDENTS'  
ALLIANCE ON HIGHER EDUCATION AND IMMIGRATION IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

In accordance with Local Rule 7.1(b)(3), proposed amicus curiae, the Presidents' Alliance on Higher Education and Immigration (the "Alliance"), respectfully requests leave to file the attached amicus brief in support of Plaintiffs' *Motion for Preliminary Injunction* (ECF 13, 14) (the "Motion") in the above-captioned matter. In furtherance of this motion, the Alliance states as follows:

1. The Alliance is a nonpartisan, educational and advocacy non-profit organization that brings together over 570 presidents and chancellors of higher education institutions who lead institutions public and private, large and small, urban and rural, faith-based and secular, across the country. The Alliance is committed to increasing public understanding of the impact of immigration policies on higher education on our students, institutions and country and supporting immigration policies and practices that will encourage international students and scholars to enrich American institutions of higher learning. The challenged policy harms the Alliance's member institutions and over five million students. The Alliance thus has a strong interest in explaining the effects of the policy at issue and why it should be enjoined.

2. The Court has discretion to permit the filing of amicus curiae briefs. *See Bos. Gas Co. v. Century Indem. Co.*, Civ. Action No. 02-12062-RWZ, 2006 WL 1738312, at \*1 n.1 (D. Mass. June 21, 2006) ("[C]ourts have inherent authority and discretion to appoint amici."). Amicus briefing is allowed "to assist the court in cases of great public interest by making suggestions to the court, by providing supplementary assistance to existing counsel, and by insuring a complete and plenary presentation of difficult issues so that the court may reach a proper decision." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 308 F.R.D. 39, 52 (D. Mass. 2015), *aff'd*, 807 F.3d 472 (1st Cir. 2015) (internal citations and quotations omitted).

3. The Alliance's attached proposed amicus brief will assist the Court in consideration of the pending Motion because the Alliance has unique insight into how the administration's policy of targeting non-citizen students and faculty at institutions of higher education throughout the country based on their political views imminently harms American students, universities, and the nation, and why enjoining such a policy is in the public interest. The Alliance's member institutions are firsthand witnesses to the climate of fear generated by the policy. They have seen how the climate of fear jeopardizes their abilities to fulfill their educational missions of educating the next generation of entrepreneurs, researchers, and leaders because of the policy's threats to the constitutionally-protected rights of freedom of speech and assembly for citizens and non-citizens. Because Alliance member institutions are a significant sector of the American economy and play a major role in American research and innovation, they also offer important insight into the policy's harm to American economic and competitive interests.

4. The proposed brief, excluding exhibits and appendices, does not exceed twenty pages in length.

5. All parties have consented to the relief requested by this motion.

WHEREFORE, Presidents' Alliance on Higher Education and Immigration respectfully requests that this Court grant leave to file the attached amicus brief.

Dated: April 9, 2025

Respectfully submitted,

*/s/ Lauren Godles Milgroom*

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Lauren Godles Milgroom (BBO No. 698743)

Joel Fleming (BBO No. 685285)

EQUITY LITIGATION GROUP PLLC

1 Washington Mall #1307

Boston, MA 02108

Tel: 617-468-8602

lmilgroom@equitylitigation.com

jfleming@equitylitigation.com

Andrew R. Dunlap\*

Zachary Smith\*

Kayla Chen\*

SELENDY GAY PLLC

1290 Avenue of the Americas

New York, NY 10104

Tel: 212-390-9000

adunlap@selendygay.com

zsmith@selendygay.com

kchen@selendygay.com

\*pro hac vice forthcoming

*Attorneys for [Proposed] Amicus Curiae the  
Presidents' Alliance on Higher Education and  
Immigration*

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that counsel for proposed amicus curiae has conferred with counsel for the parties. No parties oppose the request for leave to file.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing (NEF) on April 9, 2025.

/s/ Lauren Godles Milgroom  
Lauren Godles Milgroom (BBO No. 698743)